

Attachment 2

From: [Ziegler Joseph A](#)
To: [Shapley Gary A Jr](#)
Cc: [Puglisi Christine A](#)
Subject: FW: Travel
Date: Monday, September 20, 2021 7:49:32 PM
Attachments: [image004.png](#)
[image002.png](#)

I'll try to see if I can reach out to Batdorf in the AM. My blood is boiling right now.

From: Denning David M [REDACTED]
Sent: Sep 20, 2021 7:47 PM
To: Puglisi Christine A [REDACTED]; Ziegler Joseph A [REDACTED]
Cc: Waldon Darrell J [REDACTED]; Denning David M [REDACTED]
Subject: RE: Travel

Yeah lets have a chat tomorrow. Looping in Darrell so we can get back on availability. Obviously we are fully supportive of the investigation. We all have a seat at the table. We are doing our job and have the same mission, If you are trying to save time and be efficient, why not take the next step to verify your witnesses are where you think they are? I don't follow your logic about the collateral, we can be discreet, and use a Doe, and we are still keeping the team small.

David Denning

Acting ASAC Branch B
Washington DC Field Office
cell [REDACTED]



From: Puglisi Christine A [REDACTED]
Sent: Monday, September 20, 2021 7:32 PM
To: Ziegler Joseph A [REDACTED]; Denning David M [REDACTED]
Subject: RE: Travel

David,

As Joe mentioned, we are trying to complete these interviews in a timely manner in order to keep up with the demanding schedule of additional forthcoming interviews and [REDACTED] in an effort to complete the SAR by year end. We both found it more efficient to attempt these interviews while out in CA, instead of making a subsequent trip out there,

which would only waste more money and time; we are trying to be as effective as possible. As I know you have been made aware, DOJ-Tax and the USAO were not prioritizing last weeks scheduled interviews, which were eventually postponed, but did agree that these LA ones are a priority and therefore are preparing [REDACTED] for us this week. We do not want to have to go to the investigative team and explain that we could not conduct these interviews due to lack of management support. We find the standard of assurances you are asking us to be unreasonable and not probable to obtain within the given time frame. I apologize for the pushback; we are not trying to be difficult at all, we are just under a lot of pressure ourselves to complete as many planned interviews as we can within the next few months to stay on track and we would appreciate more support.

Please let us know how we can come to some kind of resolution here or who we need to talk to to make that happen.

Feel free to call me if you want to discuss.

Thank you,

Christine Puglisi

Special Agent
International Tax & Financial Crimes

1200 1st St, NE
Washington, D.C. 20002
Desk: [REDACTED]
Mobil: [REDACTED]

From: Ziegler Joseph A [REDACTED]
Sent: Monday, September 20, 2021 7:14 PM
To: Denning David M [REDACTED]
Cc: Puglisi Christine [REDACTED]
Subject: RE: Travel

Again, I do not feel comfortable sending a collateral related to this investigation to any witness who has been mentioned in the media associated to Sportsman (the agent can simply Google the name, run the name in palantir and see my case). To date, we have not done a collateral related to this investigation.

While I do agree that address verification does make sense in certain cases, I do not believe it applies here. We are also working with a time constraint since my travel is planned for all of next week and the [REDACTED] are currently being issued for the October [REDACTED]

The US attorney as well as DOJ-Tax do not want us getting others involved and have asked multiple times that we keep the investigative circle small. If you Darrell still see this as an issue, please call my cell

so that we can work this out.

A case I've worked with very little problems and only support from my management, you're making it hard for me to do my job. At the end of the day, I'm just trying to bring the case to conclusion in an expeditious and efficient manner.

From: Denning David M [REDACTED]
Sent: Sep 20, 2021 6:45 PM
To: Ziegler Joseph A [REDACTED]
Cc: Puglisi Christine A [REDACTED]
Subject: RE: Travel

Lets just use a Doe investigation number for a collateral, and ask that LAFO try to verify the addresses belong to our witnesses. 6 of them?

David Denning

Acting ASAC Branch B
Washington DC Field Office
cell [REDACTED]



From: Ziegler Joseph A [REDACTED]
Sent: Monday, September 20, 2021 6:12 PM
To: Denning David M [REDACTED]
Cc: Puglisi Christine A [REDACTED]
Subject: RE: Travel

One of the witnesses was on his payroll. She also received additional wires from him, which he deducted. We are not sure if she actually is an escort, but we definitely have our suspicions and she is a crucial witness. I have pulled her accurint and Palantir which I believe provides a good address and phone number for her.

The 5 other LA witnesses are mentioned in [REDACTED] and some of the [REDACTED]s have identified addresses for them, as well as places of employment (dance clubs) in LA, and phone numbers.. One of the witnesses is a madam, was quoted in multiple media articles, owns a very public escorting business and I think should be fairly easy to find.

In addition, FBI has pulled information from their databases in

helping us identify these witnesses as well as locate them.

I have also pulled tax information. We have [REDACTED]ed some of the witnesses venmo accounts which also helped provide identifying information for these witnesses.

Every interview I have done in this case, from our day of action, to last month has been well thought out and planned accordingly. I'm going to do the same thing that I have done for all of my cases in making sure that the interviews are productive and efficient.

I hope that this information suffices and that you don't need anything more.

Joe

From: Denning David M [REDACTED]
Sent: Sep 20, 2021 5:45 PM
To: Ziegler Joseph A [REDACTED]
Cc: Puglisi Christine A [REDACTED]
Subject: RE: Travel

Yeah, the sharepoint travel if changed, does not then go back through the approval process, so you/we have to do that through email before making those changes in sharepoint. I think you hit the nail on the head though, these witnesses may be hard to find. We want more assurance your efforts will be productive. If you don't want to have a collateral done, what ideas do you have because we are not approving it as is for Los Angeles due to that fact.

David Denning

Acting ASAC Branch B
Washington DC Field Office
cell [REDACTED]



From: Ziegler Joseph A [REDACTED]
Sent: Monday, September 20, 2021 5:12 PM

To: Denning David M [REDACTED]

Cc: Puglisi Christine A [REDACTED]

Subject: Travel

Hey David –

So I've looked through my timeline of Events. This trip changed because our first two trips in the beginning of September were cancelled, and I was trying to be more efficient and getting even more stuff done. First off, every other week, we have been knocking off scheduling interviews, proffers and [REDACTED] in completing our case (Our detailed witness list is attached with status). This is all in preparation of me finishing the prosecution report by the end of 2021 and I have been maintaining a schedule in order to do so. This was also discussed in detail at the Chief Briefing, in which I detailed all of the travel that needed to be done in completing the case. I am trying to keep multiple people on the same page and do everything that I can to complete these planned interviews and to-do items.

As far as the travel goes, I didn't realize that a new travel form was needed in extending our travel dates and locations. In the past, we have updated the travel in SharePoint and everyone in the chain (including the DFO) was notified of our travel change. If these are the steps moving forward, instructions need to be sent out to the field detailing that.

As far as this trip, I do not feel comfortable in sending out collaterals and having others involved in this investigation. Some of these individuals could be prostitutes (some are even his prior employees), and locating them could be a challenge, and I will do all I can in preparing to find them. This is what I do in locating all witnesses in all of my cases. The level of assurance you are requesting is not standard operating procedure and I don't think it's something we can accomplish in this specific investigation. We have done a good job of keeping our circle small and I know that the prosecution team wants to keep it that way. We are not and have not sent collaterals related to this case as requested by DOJ and the US Attorney's Office.

A few weeks ago, DOJ-Tax was a roadblock in the investigation, and some interviews were postponed because they weren't ready.

I'm sorry that I didn't send the updated travel request, that was my fault.

These interviews are already planned for next week, the [REDACTED] are currently being drafted and approved, and I

would hope that you reconsider the request, and if needed.

Joe